

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND, INC.,
a Michigan corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756
Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS, INC.,
a Delaware corporation; CONNEXUS CORP.,
a Delaware corporation; FIRSTLOOK, INC.,
a Delaware corporation; and EPIC MEDIA
GROUP, INC., a Delaware corporation,

Defendants.

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**REPLY DECLARATION OF WILLIAM A. DELGADO IN SUPPORT OF
DEFENDANTS' COUNSELS' MOTION TO WITHDRAW**

I, William A. Delgado, declare as follows:

1. I am over the age of eighteen and am lead counsel for Defendants in this matter. I have personal knowledge of the facts stated herein except where stated on information and belief, and, as to those matters, I believe them to be true.

2. Attached as Exhibit A to the Reply Memorandum In Support of Defendants' Counsel's Motion to Withdraw ("Reply Memorandum") is a true and correct copy of a summons and complaint in *American Media, Inc. v. Epic Media Group, Inc., et al.*

3. Attached as Exhibit B to the Reply Memorandum is a true and correct copy of an e-mail dated March 20, 2012 from Vito Lella to myself, Eric McDonough and David Graff.

4. Attached as Exhibit C to the Reply Memorandum is a true and correct copy of an e-mail from CNS Dinger to me, dated May 9, 2012, notifying me of a lawsuit filed by David Halliday against Connexus Corporation in El Dorado Superior Court, California.

5. Attached as Exhibit D to the Reply Memorandum is a true and correct copy of an Internet blog article entitled "Former Epic Execs: Leaving A Sinking Ship?" found at <http://mthink.com/affiliate-performance-marketing/former-epic-execs-leaving-sinking-ship>, last visited on May 15, 2012.

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6. Attached as Exhibit E to the Reply Memorandum is a true and correct copy of an Internet blog article entitled "Epic Fails: Who is Next?" found at <http://performinsider.com/2012/05/epic-fails-who-is-next/>, last visited on May 15, 2012.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of May 2012 at Los Angeles, California.

/s/William A. Delgado

William A. Delgado

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2012, I electronically filed the foregoing paper with the Court using the ECF system which will send notification of such filing to the following:

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